

# **Alive Hospice Standards of Conduct**

## **Mission and Values Statements**

The mission of Alive Hospice is to provide loving care to people with life-threatening illnesses, support to their families, and service to the community in a spirit of enriching lives. In pursuit of our mission, we believe the following values statements are essential and timeless:

**We believe** death to be a natural extension of the life cycle

**We believe** in honesty and integrity in all we say and do

**We believe** in compassion to those we serve and to each other

**We believe** in respect and dignity for all

**We value** competent knowledgeable staff motivated to achieve personal and professional growth

**We believe** in accountability to society, our community, and each other

**We believe** in responsible stewardship of the resources to which we have been entrusted

**We believe** in the continuous pursuit of organizational excellence

**We believe** in team work to achieve our vision, mission, and to support our values

## **Overview of Organization's Commitment to Compliance**

Alive Hospice has a reputation for conducting itself in accordance with the highest level of business and community ethics and in compliance with applicable governing laws. With the Compliance/ Performance Improvement Program, Alive Hospice will promote full compliance with all legal duties applicable to it, foster and assure ethical conduct, provide guidance to employees and volunteers for his/her conduct, and will further enable Alive Hospice to be known as the provider of high quality, cost-effective hospice care to the residents of the Middle Tennessee area.

The Compliance program is designed to prevent accidental and intentional noncompliance with applicable laws, to detect such noncompliance if it occurs, to correct the behavior of those involved in noncompliant behavior and to prevent future noncompliance in conjunction with performance improvement activities.

The plan also provides for the ongoing, systematic and objective monitoring and evaluation of patient care and operations with the goal of continuously improving processes and outcomes.

## **Standards of Conduct**

The Alive Hospice Standards of Conduct (Disciplinary Action, Commitment to Quality of Care, Compliance with Laws and Regulations, Ethical Conduct, Reporting Requirements, Compliance Officer and Committee, Response and Corrective Action, Training, Responding to an Investigation, Survey or Accreditation, and Monitoring and Auditing) are guiding principles to provide our services within appropriate legal, ethical and quality standards. The Board of Directors, Leadership Team, Employees, and Volunteers (hereinafter known as "Alive Hospice colleagues") shall practice these standards. It is our obligation to apply these standards to our relationships with patients, families, the healthcare community of professionals, facilities, payers, contractors, donors, vendors, consultants, and one another. Alive Hospice colleagues will receive the Standards of Conduct on an annual basis and will sign an acknowledgement to abide by said Standards.

## **Disciplinary Action**

Alive Hospice colleagues adhere to the organization's Standards of Conduct and understand that any violations of these standards will be subject to disciplinary action up to and including termination of employment. The action will depend upon the nature, severity, and frequency of the violation. Action will be imposed in a fair and consistent manner according to Alive Hospice policies and procedures.

## **Commitment to Quality of Care**

### **Competence/Hiring Protocols**

Alive Hospice is committed to providing care of the highest quality by licensed and competent staff in accordance with laws and regulations, and accepted standards of practice. Alive Hospice values the gifts and talents of individuals who work with us to promote our mission and values. We are committed to providing an equal opportunity environment where everyone is treated with fairness, dignity and respect. We comply with federal, state and local laws with regard to non-discrimination, harassment, providing a drug-free work place, and freedom from work place violence.

To assure that employees meet the standards of our quality programs, offers of employment are contingent upon successful completion of a background and reference check, including a criminal background check, drug screening, and exclusion from participation in a Medicare or Medicaid program. In addition, all employees hired will meet the minimum education, experience and competency qualifications as defined by the position's job description.

### **Confidentiality/Privacy**

Alive Hospice respects the patient's property and right to privacy and confidentiality at all times.

All Alive Hospice colleagues shall protect the privacy of patients. Alive Hospice shall meet all requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules which safeguard the confidentiality, integrity and availability of all protected health information. Consistent with HIPAA, we do not use, disclose or discuss patient specific information with others unless it is necessary to serve the patient or required by law. Further, Alive Hospice prohibits anyone from seeking, disclosing or giving confidential information about a patient other than is necessary to perform his or her job.

### **Individualized Patient Care**

Alive Hospice provides care to each hospice patient according to a written plan of care that is established, reviewed, and revised as necessary by our Interdisciplinary Team (IDT) and the physician.

Alive Hospice provides accurate, timely and complete documentation of the care provided to the patient in the patient's medical record.

The Hospice physician and the IDT provide oversight of the patient's plan of care to ensure that the patient remains eligible for hospice services and receives care that is appropriate and necessary for the palliation of symptoms and management of the terminal illness.

Alive Hospice coordinates, and arranges and monitors for the provision of professional management of care under written contracts and agreements with other providers to assure that the care is provided in accordance with the patient's hospice plan of care regardless of setting or location of care.

### **Providing Care to Nursing Home Residents**

Alive Hospice will provide sufficient oversight to ensure nursing home residents receive care according to the hospice plan of care. We will coordinate care of nursing home residents with the facility staff to ensure that residents receive the same level of care as hospice patients who reside in their own homes. Alive Hospice shall execute agreements with nursing homes prior to providing hospice services to residents. The agreements shall be monitored at least annually for compliance.

### **Quality Monitoring Objectives**

Alive Hospice will conduct ongoing performance improvement activities which provides opportunities to improve existing processes, outcomes of care, and perceptions of care. The program further underscores our commitment to quality patient care and business practices. Performance improvement activities may or may not be initiated solely in response to opportunities identified through audits, indicators and data collection. All Alive Hospice colleagues have opportunities for input regarding areas needing improvements and means for improving. Please refer to the QAPI Policy and Plan for further details.

## **Compliance with Laws and Regulations**

Alive Hospice complies with all federal and state laws and regulations, governing and related to the provision of hospice care to terminally ill patients and their caregivers.

Alive Hospice accepts patients into the program regardless of ability to pay.

Alive Hospice respects the patient's right to informed consent in choosing hospice. We provide complete and accurate information to patients and caregivers about the palliative nature of hospice care, the Medicare Hospice Benefit, insurance coverage, their criteria for eligibility, and any limitations of coverage.

Alive Hospice ensures that patients who elect the Medicare Hospice Benefit (if applicable) meet eligibility requirements for admission to the program and continue to be eligible throughout the provision of hospice care. Additionally, the interdisciplinary team and the physicians review medical information in order to provide appropriate and timely certification and recertifications of terminal illness.

## **Ethical Conduct**

Alive Hospice maintains high standards of business and ethical conduct in accordance with applicable federal, state and local laws pertaining to fraud, waste, and abuse. This conduct pertains to behaviors to patients, to the organization, and to one another.

Alive Hospice has adopted "Ethical Principles: Guidelines for Hospices and Palliative Care Organizational and Clinical Conduct" the Hospice Code of Ethics from the National Hospice and Palliative Care Organization (NHPCO) as our model of ethical behavior.

### **Conflict of Interest**

Alive Hospice colleagues will not provide or accept gifts, or any form of remuneration to or from potential patients or referral sources (e.g., physicians, nursing homes, hospitals, patients, etc) to incent, induce or encourage the referral of business.

Alive Hospice colleagues do not participate in activities or business relationships that might pose a conflict of interest with their responsibilities to Alive Hospice or its hospice program.

**Marketing/Advertising**

Alive Hospice may use marketing & advertising to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. We present truthful, fully informative and non-deceptive information in these materials about the Alive Hospice program and criteria for admission.

**Inducement to Refer**

Alive Hospice prohibits practices which may raise anti-kickback concerns such as: paying room and board to nursing homes in excess of amounts the nursing home would have received directly from Medicaid had the beneficiary not been enrolled in hospice; referring patients to nursing homes to induce the home to refer patients; and providing free staff to nursing homes to perform duties that would be performed by the nursing home.

**Claims & Accounting**

Claims for reimbursement submitted by Alive Hospice are complete, and accurately reflect the services provided, the location of services, and the hospice provider number. Alive Hospice maintains a system of internal controls to provide reasonable assurances that all transactions are executed properly. Alive Hospice cost report is completed in conformance with laws and regulations, is accurate, and is submitted on time.

**Protection of Documents**

All documents pertaining to the provision of care and to the compliance program will be protected, retained, and destroyed in accordance with Alive Hospice policies and procedures.

Alive Hospice colleagues do not alter or destroy documents requested by federal or state authorities, accreditation entities, and auditing firms.

**Reporting Requirements****Duty to Report**

Each individual has a responsibility and a duty to report any activity that appears to violate applicable laws, rules, regulations, standards, or this Plan. If the individual makes a report and feels that it is not given sufficient or appropriate attention, that individual should report the item to a higher level, or to the external hotline to assure that the appropriate attention is given.

Alive Hospice will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. All employees must understand, however, that circumstances may arise in which it is necessary or appropriate to disclose information. In such cases, disclosure will only be made as necessary.

There is no retribution or discipline for anyone who reports a concern in good faith. Acts of retaliation should also be reported to the Chief Compliance Officer or the Compliance hotline. Any confirmed act of retaliation will result in discipline, up to and including termination. Any person who deliberately makes a false accusation with the purpose of harming or retaliating against another individual is subject to discipline.

**How to Report**

We have provided several options for reporting concerns of an ethical or compliance issue.

We encourage the use of our internal processes for the resolution of issues, including human resources-related issues (e.g., payroll, fair treatment and disciplinary issues) and issues involving ethical dilemmas (e.g., Ethics Committee, Ethics Round Table, Case Conference procedure).

It is expected practice, when appropriate, to raise concerns with an immediate supervisor. If this is uncomfortable or inappropriate, the individual may discuss the situation with the Chief Compliance Officer as appropriate, and may follow the Complaint Resolution Procedure, or Employee Grievance Procedure as outlined. Supervisors are required to report these issues through established management channels and/or the Chief Compliance Officer.

Alive Hospice has also contracted with the Hospice Compliance Network, and individuals are free to express concerns confidentially and on an anonymous basis via this resource.

**Hospice Compliance Network:**

**Telephone – 1 (888) 765-7408 (toll free)**

**E-mail – [GuidanceLine@HospiceCompliance.net](mailto:GuidanceLine@HospiceCompliance.net)**

**Direct mail – Guidance Line  
Hospice Compliance Network  
PO Box 1647  
Annandale, VA 22003**

A complaint can also be made by contacting the **Joint Commission at [complaint@jcaho.org](mailto:complaint@jcaho.org) or 1-800-994-6610.**

## **Responding to an Investigation, Survey or Accreditation**

From time to time, government agencies, accreditation bodies, and other entities conduct surveys in our facility. It is our policy to respond with openness and accurate information. In preparation for or during a survey or inspection, Alive Hospice colleagues must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. We must never attempt to cause another person to fail to provide accurate information, or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

## **Measuring Program Effectiveness**

We are committed to assessing the effectiveness of our Compliance and Performance Improvement Program through various efforts. Ongoing audits and reviews of systems are conducted and reported through the Quality & Compliance Committee and Board of Directors.

## **Acknowledgement**

Alive Hospice colleagues will sign an acknowledgment confirming that they have received the Standards of Conduct, understand their obligations, and agree to abide by them. Further each person is required to participate in annual Standards of Conduct training.